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**From:** Cepko, Russ P [Russ.Cepko@cbs.com]  
**Sent:** 3/21/2014 8:00:29 PM  
**To:** Santos, Carmen [Santos.Carmen@epa.gov]  
**CC:** Lieben, Ivan [Lieben.Ivan@epa.gov]; Rollins, Christopher [Rollins.Christopher@epa.gov]; Chandler, Phil@DTSC [Phil.Chandler@dtsc.ca.gov]; Armann, Steve [Armann.Steve@epa.gov]; 'Leo Brausch' (lbrausch@consolidated.net) [lbrausch@consolidated.net]; Wall, William D [William.Wall@cbs.com]; McDaniel, Doug [McDaniel.Doug@epa.gov]  
**Subject:** RE: PCBs: Former Westinghouse Facility, Rancho Dominguez, CA - 40 CFR 761.61(c) Application  
**Attachments:** 00041949-D08-Figure 1.pdf; Table 1.pdf

Dear Ms. Santos,

Here is an update on the items you listed in your February 25, 2014 letter and our understanding of the process of approval for our plans from our February 28, 2014 call.

1. CBS representatives will be meeting with the building tenant and owner on March 25, 2014 to discuss the final details of the cleanup. We will seek the owners certification at that point.
2. A figure depicting the location of air samples and concrete samples is attached. Please note that we do not intend to take outside air samples. We also do not know the location of wipe and bulk dust samples yet as these will be decided in the field after additional observations of where most of the dust is (for pre-cleaning samples) and the post cleaning wipe samples will favor locations most needing cleaned. As we discussed on our call on February 28, CBS is not the building owner and as such we do not plan to take any samples of building materials.
3. With respect to figures showing the locations of barriers during cleaning, our contractor feels that these will not be necessary as the cleaning methods used (wet wipes and HEPA vacuuming) will not generate dust. If this turns out not to be the case, then plastic barriers will be placed around work areas. The meeting on March 25 will determine the starting locations for our work.
4. Attached is a table summarizing the samples to be taken during this work.
5. We will confirm the building ventilation system at our March 25 meeting.
6. We will submit a previous data summary next week. Also, as we discussed on February 28, since CBS has never owned the building, CBS does not have any records of any building materials removed from the building over time.
7. We understood, from our February 28 call, that USEPA was going to issue a conditional approval of our plans imminently and that approval would contain a date certain for completion of the items from your February 25 letter that CBS can provide. Our contractor would like to start the cleaning within a few weeks after the March 25 meeting. Please confirm that USEPA still intends to issue a conditional approval imminently. If that approval is received next week, our contractor should be able to mobilize by mid April.

Thank you,  
Russ Cepko

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**From:** Santos, Carmen [mailto:Santos.Carmen@epa.gov]  
**Sent:** Tuesday, February 25, 2014 7:16 PM  
**To:** Wall, William D; McDaniel, Doug  
**Cc:** Lieben, Ivan; Rollins, Christopher; Cepko, Russ P; Chandler, Phil@DTSC; Armann, Steve; 'Leo Brausch' (lbrausch@consolidated.net)  
**Subject:** RE: PCBs: Former Westinghouse Facility, Rancho Dominguez, CA - 40 CFR 761.61(c) Application

Dear Mr. Wall:

Thank you for submitting the 761.61(c) application that we had requested. However, USEPA R9 (USEPA) needs the additional information requested below to continue processing CBS' application under 40 CFR 761.61(c). In previous correspondence USEPA shared draft conditions of approval with CBS requesting similar information.

If CBS submits the additional information by February 27, 2014 to USEPA R9 (USEPA), then USEPA would be able to fulfill its intention to issue a conditional approval of CBS' application by March 7 or 10, 2014. If the requested information is not received by February 27th, USEPA's conditions of approval will require that such information be submitted by a certain date. Work at the facility cannot begin until USEPA has reviewed and approved the information requested in the conditions of approval.

#### **Additional Information Needed to Continue Processing CBS Application**

- In accordance with 40 CFR 761.61(c), submit the written certification consistent with 40 CFR 761.61(a)(3)(i)(E) that must be signed by both the cleanup party and the owner of the property. Inclusion of the certification language in 40 CFR 761.3 is not required, however, we request cleanup parties to also include that optional language.
- Figures to scale and depicting the north arrow that clearly show all sampling locations for indoor air samples, outdoor background air samples, bulk dust samples, surface wipe samples, bulk concrete samples, and samples of building materials that based on the age of the building may contain PCBs. Those figures must also identify the areas occupied and in use by the current tenants.
- Figures depicting the location of physical barriers and initial cleanup work containment areas relative to in-use and occupied tenant areas.
- In reference to samples, submit a table that summarizes for each environmental media (e.g., indoor air), surface (porous and/or non-porous) and/or building material (e.g., potential galbestos) the number of samples, type (wipe, bulk) of samples, location of samples, sample identification codes, analytical detection limits, and analytical methods. In previous correspondence USEPA R9 has requested a maximum analytical detection limit of 1 ug/100 cm<sup>2</sup> total PCBs for surface wipes, a detection limit for total PCBs that allows comparison of bulk dust and concrete samples to USEPA's Regional Screening Level (RSL) of 0.79 mg/kg, and a detection limit for total PCBs in air particulates and vapor that is substantially lower than USEPA's RSL for total PCBs in air of 0.021 ug/m<sup>3</sup>.
- Confirm if the Building has a ventilation system. If such system is present at the Building, propose the number of bulk dust and wipe samples that will be collected to determine if PCBs are present.
- Within 30 days after the date of this message, submit a summary of facility-wide characterization data existing and available as of February 25, 2014. In addition, provide information on building materials removed from the building when the new owner took possession of the building as well as all disposal records associated with removal of those materials.

Thank you for your patience and courtesies. I look forward to your reply.

Sincerely,

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Voice: 415.972.3360  
[santos.carmen@epa.gov](mailto:santos.carmen@epa.gov)

*"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!"* Dr. Seuss

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**From:** Wall, William D [mailto:William.Wall@cbs.com]

**Sent:** Thursday, February 20, 2014 10:41 AM

**To:** McDaniel, Doug

**Cc:** Lieben, Ivan; Rollins, Christopher; Cepko, Russ P; Chandler, Phil@DTSC; Armann, Steve; Santos, Carmen; 'Leo Brausch' (lbrausch@consolidated.net)

**Subject:** RE: PCBs: Former Westinghouse Facility, Rancho Dominguez, CA - 40 CFR 761.61(c) Application

As requested below and as discussed with Ivan Lieben on February 18<sup>th</sup>, attached is a streamlined application for approval under 40 CFR 761.61(c) and associated correspondence concerning industrial cleaning of building surfaces at the subject facility. Our understanding is that the technical details of the industrial cleaning have been worked out with, and agreed to by, EPA staff. The purpose of the industrial cleaning is not to effectuate a PCB cleanup but rather to remove surficial dirt and debris in order that representative samples of potential PCB impacted surfaces can be collected. Those sampling results then will be used to develop a work plan and subsequent application under 761.61 for the actual PCB cleanup activities.

Please call me if you have any questions.

Thank you.

Bill

William D. Wall

Vice President, Senior Counsel

CBS Law Department

CBS Corporation

20 Starwix Street, 10th Floor

Pittsburgh, PA 15222-1384

Work: 412-642-3580

Fax: 412-642-3923

E-mail: [william.wall@cbs.com](mailto:william.wall@cbs.com)

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**From:** Santos, Carmen [mailto:Santos.Carmen@epa.gov]

**Sent:** Wednesday, February 19, 2014 4:50 PM

**To:** Wall, William D

**Cc:** McDaniel, Doug; Lieben, Ivan; Rollins, Christopher; Cepko, Russ P; Chandler, Phil@DTSC; Armann, Steve

**Subject:** PCBs: Former Westinghouse Facility, Rancho Dominguez, CA - 40 CFR 761.61(c) Application

Hello Mr. Wall:

I am following up on CBS' submission of the risk-based cleanup Application under 40 CFR 761.61(c) for the subject former Westinghouse facility. As we requested in the attached e-mail message, CBS is to submit the Application to Douglas K. McDaniel, Chief, Waste and Chemical Section, Enforcement Division at [mcdaniel.doug@epa.gov](mailto:mcdaniel.doug@epa.gov) with a copy addressed to [santos.carmen@epa.gov](mailto:santos.carmen@epa.gov).

We appreciate your cooperation on the above matter and thank you for your courtesies.

Sincerely,

ED\_002285B\_00000018-00003

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105  
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*"Think left and think right and think low and think high. Oh, the things you can think up if only you try!" Dr. Seuss*

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**From:** Wall, William D [<mailto:William.Wall@cbs.com>]  
**Sent:** Tuesday, February 18, 2014 2:07 PM  
**To:** Lieben, Ivan  
**Cc:** Santos, Carmen  
**Subject:** RE: 761.61(c) application

Thanks, Ivan. Your quick response is much appreciated.

Bill

William D. Wall  
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**From:** Lieben, Ivan [<mailto:Lieben.Ivan@epa.gov>]  
**Sent:** Tuesday, February 18, 2014 4:54 PM  
**To:** Wall, William D  
**Cc:** Santos, Carmen  
**Subject:** 761.61(c) application

Bill -

I just talked to Carmen, and she said that EPA would be in position to fairly quickly issue a 761.61(c) approval to CBS along the lines of the draft approval conditions sent to Mr. Cepko. At this point, we only await an application for a 761.61(c) approval that covers the initial cleanup work and characterization. Such an application should be forwarded to Carmen as quickly as possible.

Please let me know if you have any additional questions. Also note that I will be out of the office from today until Wednesday, February 26, but you may contact Carmen in the interim.

Sincerely yours,

Ivan Lieben, Assistant Regional Counsel  
U.S. EPA Region 9, 75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3914

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